

UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

United States of America
v.

IROQUOIS GUNTER

Defendant(s)

Case No.

1:20-mj-0511

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 15, 2020 in the county of Marion in the
Southern District of Indiana, the defendant(s) violated:

Code Section

18 U.S.C. § 922 (g)(1)

Offense Description

Possession of a Firearm by a Prohibited Person

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

s/ Celia A. Wright

Complainant's signature

Celia A. Wright, Special Agent/ATF

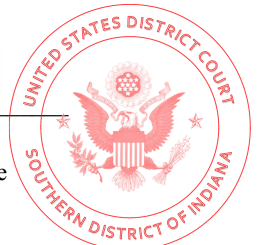
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by
telephone (reliable electronic means)

Date: 06/22/2020

City and state: Indianapolis, IN

Tim A. Baker
Tim A. Baker
United States Magistrate Judge
Southern District of Indiana



AFFIDAVIT IN SUPPORT OF
APPLICATION FOR CRIMINAL COMPLAINT

1. Your Affiant is a Special Agent (SA) with the federal Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), a component of the United States Department of Justice, and has served in that capacity since 2015. Your Affiant is currently assigned to the Indianapolis Group I Field Office – Crime Gun Intelligence Center (CGIC) and is charged with investigating violations of federal firearms, explosives, and arson laws, as well as offenses enumerated in Titles 18 and 26 of the United States Code, for all of which your Affiant has received formal training at the Federal Law Enforcement Training Center and the ATF National Academy. As a federal agent, your Affiant is a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws.

2. This affidavit is submitted in support of a criminal complaint charging Iroquois GUNTER with Possession of a Firearm By a Prohibited Person in violation of Title 18, United States Code, Section 922(g)(1). The information contained in the below numbered paragraphs is either personally known to your Affiant or told to your Affiant by other law enforcement officers.

Facts Supporting Probable Cause

3. On June 15, 2020, Indianapolis Metropolitan Police Department (IMPD) officers came into contact with Iroquois GUNTER at 3102 Guion Road in Indianapolis, Indiana. At the time of this encounter GUNTER was a wanted subject due to having warrants for his arrest. Officers were able to detain GUNTER and confirmed that he had outstanding warrants. GUNTER was placed under arrest.

4. During a search incident to arrest, IMPD officers located a black Hi-Point, model JHP, .45 caliber firearm, bearing serial number X456731 in GUNTER's front right waistband. The black High Point firearm was loaded with six (6) rounds of ammunition in the magazine and one (1) round of ammunition in the chamber.

5. A computerized search of GUNTER's criminal history revealed the following felony convictions:

- a. Two (2) counts of Invasion of Privacy, as a level 6 felony under Marion County Cause # 49G17-1809-F6-030374 on or about November 8, 2018, and/or
- b. Two (2) counts of Invasion of Privacy, as a level 6 felony under Marion County Cause # 49G17-1809-F6-029893 on or about November 8, 2018, and/or
- c. Criminal Recklessness, as a level 6 felony and Invasion of Privacy as a level 6 felony under Marion County Cause # 49G17-1808-F6-028196 on or about November 8, 2018, and/or
- d. Intimidation, as a level 6 felony, under Marion County Cause # 49G17-1610-F6-040780 on or about May 9, 2017, and/or
- e. Intimidation, as a level 6 felony, under Marion County Cause # 49G17-1610-F5-040202 on or about May 9, 2017.

6. An interstate nexus expert with ATF reviewed the description of the firearm and ammunition located on GUNTER's person on June 15, 2020. Based on those characteristics, it was determined that neither the firearm nor the rounds of ammunition were manufactured in the state of Indiana. By virtue of their presence in the State of Indiana, therefore, the firearm and ammunition had to have been transported or shipped in interstate or foreign commerce.

Conclusion

7. Based on the facts set forth in this affidavit, your Affiant submits that probable cause exists that on June 15, 2020, in the Southern District of Indiana, Iroquois GUNTER, having been knowingly convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm and ammunition, said firearm and ammunition having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1). I respectfully request this Court issue a Criminal Complaint charging GUNTER accordingly, along with a warrant for his arrest.

s/ Celia A. Wright

Celia A. Wright, Special Agent
Bureau of Alcohol, Tobacco, Firearms, and Explosives

Attested to by the applicant in accordance with the requirements of Federal Rules of Criminal Procedure 4.1 and 41(d)(3) by reliable electronic means. (Telephone)

June 22, 2020

Tim A. Baker

Tim A. Baker
United States Magistrate Judge
Southern District of Indiana

